

Chantel Barrett

From: Barak Cardenas <barak@cardenasislam.com>
Sent: Wednesday, November 20, 2019 11:44 AM
To: Chantel Barrett
Cc: Nakano, Serene (USTP); McMahon, Michelle; NEWELL FUNDING_ LLC_BRONX MIRACLE GOSPEL TABERNACLE _35118_00001_ E_Mail
Subject: Re: [EXTERNAL] RE: In re Bronx Miracle Gospel Tabernacle Word of Faith Ministries, Inc., Case No. 19-12447

Good morning

We request an opportunity to respond to Ms. McMahon's letter before we participate in a conference regarding this matter.

Thank you.

Barak Cardenas

On Wed, Nov 20, 2019 at 8:33 AM McMahon, Michelle <mmcmahon@cullenanddykman.com> wrote:
Thank you. I will coordinate with the other counsel and we will call chambers.

*The debtor should file
a response by Nov. 22, 2019
Smo
LWBT
11/20/19*

Michelle

On Nov 20, 2019, at 7:48 AM, Chantel Barrett <Chantel_Barrett@nysb.uscourts.gov> wrote:

Please call chambers to schedule a conference.

From: McMahon, Michelle <mmcmahon@cullenanddykman.com>
Sent: Tuesday, November 19, 2019 3:56 PM
To: NYSBml_Bernstein's_Chambers_Staff <bernstein.chambers@nysb.uscourts.gov>
Cc: barak@cardenasislam.com; Nakano, Serene (USTP) <Serene.Nakano@usdoj.gov>; NEWELL FUNDING_ LLC_BRONX MIRACLE GOSPEL TABERNACLE _35118_00001_ E_Mail <{F675473}.CLIENTS@imanager.cullenanddykman.com>; McMahon, Michelle <mmcmahon@cullenanddykman.com>
Subject: RE: In re Bronx Miracle Gospel Tabernacle Word of Faith Ministries, Inc., Case No. 19-12447

Judge Bernstein:

Newell Funding, LLC ("Newell") submits the attached letter requesting that the Court direct above-referenced debtor (the "Debtor") to comply with the Notice of Deposition issued by Newell and Order Granting Motion Of Newell Funding, LLC For Entry Of An Order Pursuant To Bankruptcy Rule 2004 [D.I. 30] or schedule a

conference to address the Debtor's failure to comply pursuant to Local Bankruptcy Rule 7007-1(b). This letter has also been filed on the docket and a hard copy will be delivered overnight to the Court.

Thank you in advance for your time and attention to this matter.

Sincerely,

Michelle

Michelle McMahon

Partner

Cullen and Dykman LLP

44 Wall Street

New York, New York 10005

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